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13 Alameda County and Alameda County
14 Board of Supervisors

15 **UNITED STATES DISTRICT COURT**
16 **NORTHERN DISTRICT OF CALIFORNIA, SAN FRANCISCO DIVISION**

17 JOHN WILLIAMS, ROBERT
18 VOGEL, SHEANNA ROGERS,
19 MICHAEL LOEB, JAQUELINE
WATSON-BAKER, and HOUSING
PROVIDERS OF AMERICA,

20 Plaintiffs and
21 Petitioners,

22 v.

23 ALAMEDA COUNTY, ALAMEDA
COUNTY BOARD OF
SUPERVISORS, CITY OF
OAKLAND, OAKLAND CITY
COUNCIL, and DOES 1-10,

24 Defendants and
25 Respondents,

26 v.

27 ALLIANCE OF CALIFORNIANS
28 FOR COMMUNITY
EMPOWERMENT ACTION,

29 Defendant-Intervenor

30 Case No. 3:22-cv-01274-LB

31 **STIPULATION TO INCREASE
32 PAGE LIMIT; ~~[PROPOSED]~~
33 ORDER**

34 Hon. Laurel Beeler

35 Trial Date: none set

1 WHEREAS, on March 1, 2022, in *Williams v. County of Alameda*, N.D. Cal.
2 Case No. 3:22-cv-01274-LB, Plaintiffs John Williams, Robert Vogel, Sheanna
3 Rogers, Michael Loeb, Jacqueline Watson-Baker, and Housing Providers of America
4 (together, “Williams Plaintiffs”) filed a Complaint for Damages and Petition for
5 Writ and Request for Immediate Stay against Defendants Alameda County,
6 Alameda County Board of Supervisors (together, the “County”), City of Oakland,
7 and Oakland City Council;

8 WHEREAS, on May 5, 2022, in *California Apartment Association v. County of*
9 *Alameda*, N.D. Cal. Case No. 3:22-cv-02705-LB (“CAA”), Plaintiffs California
10 Apartment Association, Stephen Lin, Rakesh and Tripti Jain, Alison Mitchell,
11 Michael Hagerty, and H. Alex and Dannie Alvarez (together, “CAA Plaintiffs”) filed
12 a Complaint for Damages, Injunctive, and Declaratory Relief and Petition for Writ
13 of Mandate against the County;

14 WHEREAS, on April 27, 2022, Intervenor-Defendant Alliance of Californians
15 for Community Empowerment Action (“ACCE”) and the parties in *Williams*
16 stipulated to ACCE’s intervention in *Williams*;

17 WHEREAS, on April 28, 2022, the Court entered an order granting ACCE’s
18 intervention in *Williams*;

19 WHEREAS, on May 17, 2022, the Court entered an order relating *Williams*
20 and *CAA*;

21 WHEREAS, on July 18, 2022, the Williams Plaintiffs filed a motion for
22 partial summary judgment;

23 WHEREAS, on July 18, 2022, the CAA Plaintiffs filed a motion for partial
24 summary judgment;

25 WHEREAS, both motions rely on a similar factual background and raise
26 overlapping claims against the County;

27 WHEREAS, because of the significantly overlapping issues in the two
28 motions for summary judgment, it is in the interest of convenience of both the

1 parties and the Court that the County file a single brief in opposition to both
2 motions; and

3 WHEREAS, responding to both motions in the same brief will require more
4 pages than the 25-page limit established by Civil Local Rules 7-3(a) and 7-4(b).

5 IT IS THEREFORE STIPULATED by and among the parties that:

6 1. The County may file in both cases a single, consolidated opposition
7 responding to both the Williams and CAA Plaintiffs' summary judgment motions
8 instead of two distinct oppositions.

9 2. The County's consolidated opposition shall not exceed 40 pages of text.

10 3. The parties request that the Court enter the attached order
11 accordingly.

12 4. This stipulation may be executed in counterparts.

13 DATED: August 26, 2022 SHUTE, MIHALY & WEINBERGER LLP

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15 By: /s/Matthew D. Zinn

16 MATTHEW D. ZINN
17 EDWARD T. SCHEXNAYDER
18 MINDY K. JIAN

19 Attorneys for Defendants and Respondents
20 Alameda County and Alameda County
21 Board of Supervisors

22 DATED: August 26, 2022 BARBARA J. PARKER, CITY ATTORNEY

23 By: /s/Cynthia F. Stein

24 CYNTHIA F. STEIN
25 Deputy City Attorney

26 Attorneys for Defendants and Respondents
27 City of Oakland and Oakland City Council

1 DATED: August 26, 2022

SUSMAN GODFREY LLP

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By: /s/Nicholas N. Spear

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MARC SELTZER
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Attorneys for Intervenor-Defendant
Alliance of Californians for Community
Empowerment Action

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DATED: August 26, 2022

ZACKS, FREEDMAN & PATTERSON, PC

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By: /s/Emily L. Brough

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ANDREW M. ZACKS
EMILY L. BROUGH

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Attorneys for Plaintiffs and Petitioners
John Williams, Robert Vogel, Sheanna
Rogers, Michael Loeb, Jacqueline Watson-
Baker, and Housing Providers of America

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I hereby attest that I have on file all holographic signatures corresponding to
any signatures indicated by a conformed signature (/s/) within this e-filed document.

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DATED August 26, 2022

/s/Matthew D. Zinn

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[PROPOSED] ORDER

2 The parties having met and conferred and entered the foregoing Stipulation,
3 which the Court has reviewed, and good cause appearing, the County's opposition
4 to the pending motion for partial summary judgment shall not exceed 40 pages of
5 text.

6 | IT IS SO ORDERED.

8 | DATED: August 29, 2022

WBC

HONORABLE LAUREL BEELER
United States Magistrate Judge